



THE STATE
of ALASKA

GOVERNOR BILL WALKER

Department of Natural Resources

OFFICE OF PROJECT MANAGEMENT & PERMITTING

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January 18, 2018

Curtis Caton

8510 Mendenhall Loop Road

Juneau AK, 99801

Submitted electronically to: comments-alaksa-tongass-juneau@fs.fed.us

Dear Mr. Caton:

Re: Environmental Assessment in response to Coeur Alaska's proposed five-year exploration plan for the Kensington Gold Mine

I have coordinated with the Alaska Departments of Natural Resources (ADNR), Environmental Conservation, and Fish and Game (ADF&G) to review the U.S. Forest Service's (Forest Service) Environmental Assessment (EA) for Coeur Alaska's Kensington Gold Mine 2018-2022 Exploration Project. Please consider these consolidated agency comments in your decision.

Reclamation:

The EA (Exploration Activities, pg. 8) states, "Coeur Alaska will reseed disturbed areas with a seed mix if prescribed by the Forest Service." Due to the poor performance of the Revegetation Test Plots, ADNR requests that the Forest Service discuss seed mix options before finalizing any prescribed seed mix use for reclamation of disturbed areas.

Aquatic Resources:

Mitigation measures suggested by ADF&G in their scoping comments¹ are included in the EA on page 28. ADF&G offers the following comments for clarification:

Page 23, first paragraph: The EA states avoidance behavior can be expected from Sitka black-tail deer and brown bear during work activity, but under Management Indicator Species on the same page, "no effects determined" is listed for both species. Please clarify the effects analysis for these species.

Page 24, first paragraph: The mountain goat summer (i.e. kidding) and winter use maps ADF&G provided during scoping are based on the ADF&G's GPS collar data, not the winter habitat resource selection function model, in White and Gregovich (2017).

Page 27, last paragraph: Since Coeur Alaska may clear up to 5 acres of land annually, please provide additional information on how the USFS determined there would be "minimal habitat loss" of mountain goat winter habitat.

¹ Johnny Zutz, Habitat Biologist, Alaska Department of Fish and Game Division of Habitat, to Kyle Moselle, Alaska Department of Natural Resources Office of Project Management and Permitting. Memorandum: Kensington 5-year Surface Exploration Plan Comments; dated 6/28/2017.

Page 30, third paragraph: The third recommendation incorporates the 1500 m buffer recommendation from ADF&G's scoping comments, based on Hurley (2004), however the winter December 15–April 14 timing window is from White and Gregovich (2017); this window was used to generate the model and is not intended to be used as a winter timing window for development activities. Please change the winter timing window to November 15–April 30 as provided in ADF&G's scoping comments.

Additionally, the paragraph incorrectly describes “winter habitat identified by the ADFG study.” The maps ADF&G provided during scoping were based on ADF&G GPS collar data, not winter habitat as predicted by the habitat resource selection model in White and Gregovich (2017).

ADF&G continues to recommend a 1500 m buffer, where practicable, for all observed goats regardless of season, not winter habitat as suggested in the EA (Page 24, paragraph 2 & Page 30, paragraph 3).

References:

Hurley, K. 2004. Northern Wild Sheep and Goat Council position statement on helicopter-supported recreation and mountain goats, July 2004. Biennial Symposium of the Northern Wild Sheep and Goat Council 14:131–136.

White, K. S. and D. P. Gregovich. 2017. Mountain goat resource selection in relation to mining-related disturbance. Wildlife Biology 2017, wlb.00277. doi:10.2981/wlb.00277

Thank you for the opportunity to review and comment on this EA. If you have any questions, or if you would like to discuss any of our comments in more detail, please contact me.

Sincerely,



Kyle Moselle
Associate Director

cc: Johnny Zutz, Habitat Biologist, ADF&G
David Wilfong, Engineering Associate, ADNR